

AGNIFILO INTRATER

December 5, 2024

VIA ECF

Hon. Arun Subramanian
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: ***United States v. Combs, 24-cr-542 (AS)***

Dear Judge Subramanian:

We write in brief response to the government's request for an extension of the briefing schedule. Dkt. 100.¹ While we do not oppose a reasonable extension, we request that the briefing schedule be complete within two weeks so that the parties can be heard on the issue at the December 18, 2024 conference. Accordingly, we propose the following briefing schedule: Government opposition due December 12, 2024, and Defense reply due December 16, 2024. An extra week should accommodate the government's request, especially in light of the fact that these issues have already been raised, and because the government's Filter Team is already "led by an Assistant United States Attorney in the office," Nov. 19, 2024 Tr. at 17, obviating any need to "add an Assistant United States Attorney to the Filter Team." Dkt. 100 at 1. Moreover, the government is incorrect that no prejudice will ensue from further delay, as the government is actively pursuing new leads and gathering new evidence based on unlawfully acquired information.

We appreciate the Court's consideration.

Respectfully submitted,



Marc Agnifilo
Teny Geragos
AGNIFILO INTRATER
445 Park Ave., 7th Fl.
New York, NY 10022
646-205-4350
marc@agilawgroup.com
teny@agilawgroup.com

¹ The government asked for defense counsel's position less than two hours prior to filing its request.

Hon. Arun Subramanian
December 5, 2024
Page 2 of 2

Anthony Ricco
Law Office of Anthony L. Ricco
20 Vesey Street
New York, NY 10007
(212) 791-3919
tonyricco@aol.com

Alexandra Shapiro
Shapiro Arato Bach LLP
1140 Avenue of the Americas, 17th Fl.
New York, NY 10036
(212) 257-4881
ashapiro@shapiroarato.com

Anna Estevao
SHER TREMONTE LLP
90 Broad St., 23rd Fl.
New York, NY 10004
(212) 202-2600
aestevao@shertremonte.com